

REMARKS

Claims 1-11 are pending in the application. Claims 1, 3-5 and 9-11 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,291,282 (issued to Nakagawa; hereinafter “Nakagawa”) and U.S. Patent No. 6,771,813 (issued to Katsuyama; hereinafter “Katsuyama”) and further in view of U.S. Patent No. 3,688,266 (issued to Watanabe *et al.*; hereinafter “Watanabe”). Claims 2 and 6 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Nakagawa, Katsuyama, Watanabe and further in view of U.S. Patent No. 6,574,374 (issued to Acharya; hereinafter “Acharya”). Applicant submits the arguments below in traversal of the claim rejections.

Applicant submits that claim 1 is patentable because a *prima facie* case of obviousness has not been established. Applicant maintains the position that, although Watanabe discloses raising a threshold voltage level of a quantization pattern, claim 1 recites increasing a denoising threshold value which is not taught or suggested by Watanabe. Because Nakagawa and Katsuyama fail to teach or suggest the claimed denoising threshold value, claim 1 is patentable.

Applicant argues that claims 2-4 and 11, which depend from or ultimately depend from claim 1, are patentable for at least the reasons submitted for claim 1.

Claims 5, 6 and 10 recite similar features to those discussed above and thus, Applicant submits that claims 5, 6 and 10 are patentable for reasons similar to those submitted for claim 1.

In addition, Applicant submits that claim 3 is patentable because Nakagawa, Katsuyama and Watanabe fail to teach, suggest or provide motivation for:

(c-5) discriminating whether a current pattern quantizing value is identical to a previous pattern quantizing value;

(c-6) increasing the denoising threshold value if the current pattern quantizing value is identical to the previous pattern quantizing value

In the Office Action, the Examiner cites column 8, lines 25-67 of Nakagawa as disclosing (c-5). Applicant disagrees. Nowhere is there any mention of discriminating whether a current pattern quantizing value is identical to a previous pattern quantizing value. Rather, Nakagawa discloses determining whether a predicted quantization width falls within a certain range. See col. 8, lines 31-38.

Assuming *arguendo*, that Nakagawa discloses discriminating whether a current pattern quantizing value is identical to a previous pattern quantizing value, the combination of Nakagawa, Katayama and Watanabe still fails to teach or suggest the relationship between (c-5) and (c-6), i.e., increasing the denoising threshold value if the current pattern quantizing value is identical to the previous pattern quantizing value.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. § 1.116
U.S. APPLN. NO.: 09/822,838

ATTY DOCKET NO.: Q59546

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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